



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 9  
75 Hawthorne Street  
San Francisco, California

June 21, 2011

Mr. Ed Modiano

RE: EPA Comments on *Testing and Startup of the Expanded Interim Soil Vapor Extraction (ISVE) System, Omega Chemical Superfund Site*, prepared by OPOG and dated May 3, 2011

Dear Mr. Modiano:

EPA has reviewed OPOG's *Response to EPA Comments on Testing and Startup of the Expanded Interim Soil Vapor Extraction (ISVE) System, Omega Chemical Superfund Site*, prepared by OPOG and dated May 3, 2011.

Background: OPOG provided EPA with an initial technical memo for an Addendum/Expansion Memo to the Preliminary Design Report (PDR) for the interim SVE System (ISVE) on April 6, 2010. EPA provided comments on June 16, 2010 and a revised addendum was submitted to EPA on June 29, 2010. On July 16, 2010, EPA indicated that the response to comments were satisfactory and requested the submittal of a final Addendum, which was submitted on November 18, 2011. EPA provided comments on the Preliminary Design Report (PDR) for the interim SVE System dated on November 30, 2010.

On January 17, 2011 OPOG provided a response to EPA's comments and attached a Technical Memorandum describing the test procedures to be followed to assess the new expansion wells. On March 9, 2011 EPA provided comments on OPOG's *"ISVE Expansion Summary and Response to EPA Comments on Proposed Addendum to Final Approved Interim Soil Vapor Extraction (ISVE) Preliminary Design Report"* dated January 17, 2011 and the *"Omega Expansion Wells Pilot Test for the ISVE System."* dated January 14, 2011.

OPOG submitted the Proposed Addendum to Final Approved Interim Soil Vapor Extraction (SVE) System Preliminary Design Report (PDR), Omega Chemical Superfund Site, Whittier, CA 90602, dated April 12, 2010. EPA reviewed and provided comments in an email dated April 21, 2011 requesting a revised As Built

and OMM by May 17th. OPOG subsequently provided the *Testing and Startup of the Expanded Interim Soil Vapor Extraction (ISVE) System, Omega Chemical Superfund Site*, prepared by OPOG and dated May 3, 2011.

EPA has completed our review of that document and our comments include:

1. The second to the last paragraph in OPOG's response to previous EPA comments states that granular activated carbon (GAC) usage should not vary significantly for two reasons:
  - a) the new unit is expected to manage condensate more effectively, and
  - b) the expansion wells will add significantly less mass than the original wells provided during the initial months of operation.
    - With regard to more effective management of condensate, please be sure to include in the ISVE As-Built and OM&M Manual the recent installation of a variable frequency drive (VFD) controller on the heat exchanger upstream of the GAC adsorbers to improve GAC adsorption efficiency as described in the March 2011 Short Term Mitigation Air Sampling Report (STMAR).
    - With regard to the mass loadings of VOCs based on the expanded ISVE system, please provide the estimated VOC mass loadings to the GAC system before and after the ISVE expansion to allow EPA to make a quantitative comparison of the impact of changed VOC mass loadings on the GAC system. The VOC mass loading estimates should be based on measured flow rates and corresponding analytical results. The necessary data should be available because the ISVE expansion test plan required summa canister sampling (and subsequent laboratory analysis) and PID, flow, and pressure readings during each individual expansion well test.

Please provide a revised As Build and OMM within 14 days or by July 5, 2011.  
If you have any questions about this letter, please contact me at (415) 947-4183.

Sincerely,



Lynda Deschambault  
Superfund Remedial Project Manager

Cc via EMAIL only:

Stephanie Lewis, California EPA Department of Toxic Substances Control  
Tom Perina, Ch2MHill